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September 17, 2024

Via ECF

Honorable Taryn A. Merkyl
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Korey Watson v. City of New York, et al.*,
23-CV-08975 (LDH) (TAM)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, and the attorney assigned to the defense of the above-referenced matter. Defendant City respectfully requests that the Court (1) adjourn the status conference currently scheduled for September 25, 2024 and (2) grant a similar adjournment of the parties' obligation to submit a Case Management Plan. *See* Civil Docket Entry No. 24. Plaintiff's counsel consents to these requests. This is the first request of its kind.

By way of background, plaintiff alleges that, on September 7, 2022, he appeared at the Human Resources Administration office, as instructed, at 275 Bergen St., to resolve issues with his benefits when he was stabbed with a boxcutter by another individual in line for services. *See* ECF No. 1. Plaintiff alleges, *inter alia*, that defendants City of New York, FJC security, and John and Jane Doe FJC Security officers violated both his state and federal constitutional rights, and brings additional state law claims including a claim for negligent hiring and training. *Id.* On May 29, 2024 Plaintiff filed an amended complaint adding seven John Doe defendants¹ as parties in this action. *See* Civil Docket Entry No. 18.

The instant adjournment is necessary because, for personal reasons, the undersigned must be out of the office on September 25, 2024. The undersigned apologizes for any inconvenience to Court and counsel, regretfully, the obligation to which the undersigned must attend can neither be rescheduled nor assigned to another person to fulfill.

¹ The individually named defendants are Sabrina Duncan, Ashley Johnson, Kern Proberhbs, Natasia Lyles, Tamika Jenkins, Patricia Robinson, and Sean Williams. *See* Civil Docket Entry No. 18.

Accordingly, and with Plaintiff's consent, the undersigned respectfully requests that the Court (1) adjourn the status conference currently scheduled for September 25, 2024 and (2) grant a similar adjournment of the parties' obligation to submit a Case Management Plan.

Thank you for your consideration herein.

Respectfully submitted,

KellyAnne Holohan /s/

KellyAnne Holohan
Senior Counsel

cc: **Via ECF**
All counsel of record